

EXHIBIT A

Guy B. Wallace (SBN 176151)
 gwallace@schneiderwallace.com
 Sarah Colby (SBN 194475)
 scolby@schneiderwallace.com
 Jennifer A. Uhrowczik (SBN 302212)
 juhrowczik@schneiderwallace.com
 SCHNEIDER WALLACE COTTRELL KONECKY
 WOTKYNS LLP
 2000 Powell Street, Suite 1400
 Emeryville, CA 94608
 Tel: (415) 421-7100
 Fax: (415) 421-7105

Linda M. Dardarian (SBN 131001)
 ldardarian@gbdhlegal.com
 Andrew P. Lee (SBN 245903)
 alee@gbdhlegal.com
 GOLDSTEIN, BORGEN, DARDARIAN & HO
 300 Lakeside Drive, Suite 1000
 Oakland, CA 94612
 Tel: (510) 763-9800
 Fax: (510) 835-1417

Attorneys for Plaintiffs and the Proposed Classes
 (Additional Counsel for Plaintiffs listed on following page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ABDUL NEVAREZ, PRISCILLA NEVAREZ, and
 SEBASTIAN DEFRANCESCO, on behalf of
 themselves and all others similarly situated,

Plaintiffs,

vs.

FORTY NINERS FOOTBALL COMPANY, LLC,
 a Delaware limited liability company, et al.,

Defendants.

Case No.: 5:16-cv-07013 -LHK

**PLAINTIFF ABDUL NEVAREZ'S
 INTERROGATORIES PROPOUNDED ON
 FORTY NINERS FOOTBALL COMPANY
 LLC, FORTY NINERS SC STADIUM
 COMPANY LLC & FORTY NINERS
 STADIUM MANAGEMENT COMPANY
 LLC**

(SET ONE)

Before: Hon. Lucy H. Koh
 Complaint Filed: December 7, 2016
 Trial Date: April 22, 2019

1 Adam B. Wolf (SBN 215914)
awolf@prwlegal.com
2 Catherine Cabalo (SBN 248198)
ccabalo@prwlegeal.com
3 PEIFFER ROSCA WOLF ABDULLAH CARR & KANE
4 4 Embarcadero Center, 14th Floor
San Francisco, CA 94104
Tel: (415) 766-3592
5 Fax: (415) 402-0058

6 Attorneys for Plaintiffs and the Proposed Classes
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROPOUNDING PARTY: Plaintiff Abdul Nevarez

RESPONDING PARTY: Defendants FORTY NINERS FOOTBALL COMPANY LLC;
FORTY NINERS SC STADIUM COMPANY LLC; FORTY NINERS
STADIUM MANAGEMENT COMPANY LLC

SET NO.: ONE (1)

Pursuant to Federal Rule of Civil Procedure 26, Plaintiff Abdul Nevarez propounds his first set of interrogatories on Defendants FORTY NINERS FOOTBALL COMPANY LLC; FORTY NINERS SC STADIUM COMPANY LLC; FORTY NINERS STADIUM MANAGEMENT COMPANY LLC (“Defendants”). Under the provisions of Federal Rule of Civil Procedure 33, Defendants are required to serve full and complete written responses within thirty (30) days of service hereof to Plaintiffs’ counsel of record. You are requested to set out each interrogatory prior to the answer directed to it.

For each interrogatory or part of each interrogatory which the Defendants refuse to answer on the ground of privilege, state the specific nature of the privilege claimed with appropriate citation to the relationship or information claimed to be privileged and the reason for this privilege.

These requests are continuing in nature and require supplemental responses as provided by Rule 26 of the Federal Rules of Civil Procedure.

In answering these interrogatories, furnish all information as it is available to you, including information in the possession of your attorneys, investigators, employees, agents and representatives, and not merely information of your own personal knowledge.

If you cannot answer the following interrogatories in full after exercising due diligence, answer the remainder and state whatever information or knowledge you have concerning the unanswered portion.

If any interrogatory calls for a description of a document, photograph, or other writing or thing, describe it in detail sufficient to satisfy the requirements for issuance of a subpoena, or in lieu thereof, attach a copy of such document to your answers to interrogatories.

DEFINITIONS

1. “ADDRESS” means the street address, including the city, state, and zip code.
2. “DEFENDANT” shall mean and refer to the defendants FORTY NINERS FOOTBALL COMPANY LLC, FORTY NINERS SC STADIUM COMPANY LLC, FORTY NINERS STADIUM

MANAGEMENT COMPANY LLC, or any subsidiary, division, related company, officer, director, partner, employee, agent, board of directors, board member, and representative of those entities.

3. The singular shall include the plural and vice versa; the terms “and” and “or” shall be both conjunctive and disjunctive; the term “including” means “including without limitation.”

4. If any request is defined using a term of art or other terms that you believe to be incorrect, but you understand the nature of the information requested, you should respond notwithstanding the semantic or definitional error or ambiguity.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify by name, ADDRESS, telephone number, and email address all persons who purchased accessible seating tickets from DEFENDANTS for any event held at Levi’s Stadium on or after July 17, 2014. This interrogatory seeks only information within the possession, custody, and/or control of DEFENDANT.

INTERROGATORY NO. 2:

Identify by name, ADDRESS, telephone number, and email address all persons who purchased accessible parking passes from DEFENDANTS for any event held at Levi’s Stadium on or after July 17, 2014. This interrogatory seeks only information within the possession, custody, and/or control of DEFENDANT.

Dated: October 6, 2017

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO



Andrew P. Lee

Attorneys for Plaintiffs and the Proposed Classes